

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

WILLIAM H. OLIVER, JR.
Attorney for Debtor[s]
2240 Highway 33-Suite 112
Neptune, NJ 07753
732-988-1500
WO-7129

In Re:

Maria Sosa

Case No.: 15-31662

Judge: KCF

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

☐ **CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

☒ **TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following
(choose one):

1. ☐ Motion for Relief from the Automatic Stay filed

by _____, creditor,

A hearing has been scheduled for _____, at _____ m.

OR

☐ Motion to Dismiss filed by the Standing Chapter 13 Trustee.

A hearing has been scheduled for _____, at 9:00 am.

☐ Certification of Default filed by _____, creditor,

I am requesting a hearing be scheduled on this matter.

OR

☒ Certification of Default filed by Standing Chapter 13 Trustee

I am requesting a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

☐ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached hereto.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):
See Attached Certification in Opposition

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 08/23/2017

/s/ Maria Sosa
Debtor's Signature

Date: _____

Debtor's Signature

NOTE:

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a *Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss*.
2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within 14 days of the filing of a *Creditor's Certification of Default* (under an *Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions*) or a *Trustee's Certification of Default*.

If this form is not filed the Motion or Certification of Default will be deemed uncontested and no hearing will be scheduled.

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WILLIAM H. OLIVER, JR., WO 7129
2240 Highway 33
Suite 112
Neptune, New Jersey 07753
732-988-1500
Attorney for Debtor(s)

In Re:

Maria Sosa

Debtors

Case No.: 15-31662

Chapter: 13

Judge: Kathryn C. Ferguson

CERTIFICATION OF DEBTOR IN OPPOSITION TO TRUSTEE'S CERTIFICATE OF DEFAULT

I, Maria Sosa, debtor in the above matter, in opposition to Trustee's Certificate of Default, do hereby certify and say:

1. I am the debtor in the above captioned matter. I acknowledge that I have become behind on my payments due to loss of work and also being out of work due to an illness for approximately two (2) months.
2. I now have new employment with New Jersey Court system and also a second job working for Markell Counseling. I should now be able to bring my account current, however, I am requesting additional time to bring the payments current. If necessary I can do a wage order if that is okay with the New Jersey Judiciary in order to pay the monthly payments.
3. I did make a payment of \$550.00 in August 2017 and can make another regular monthly payment of \$649.00 by August 28, 2017.
4. I am requesting this matter be scheduled for hearing and the scheduled hearing date be adjourned to give me time to modify my plan to re-capitalize the payment or bring the account current.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: August 23, 2017

/s/ Maria Sosa
MARIA SOSA